

REMARKS

Claims 1-2, 4-22, 24-32, and 34-59 were pending. By virtue of this response, claims 1, 21, and 31 are amended, and claims 4, 24, and 34 are cancelled. Therefore, claims 1-2, 5-22, 25-32, and 35-59 are presently pending. Amendment and cancellation of certain claims is not to be construed as dedication to the public of any of the subject matter of the previously presented. No new matter is added.

Claim Rejections Under 35 USC §102

Claims 1-8, 11-15, 19-28, 31-38, 41-45, and 49-59 are rejected under 35 U.S.C. 102(e) as being anticipated by Kravets (U.S. 6,704,727; hereinafter "Kravets").

In response, claim 1 has been amended to recite, among other things, "providing a plurality of candidate search terms related to said first search term, wherein said candidate search terms are generated in accordance with relevancy scores, said candidate search terms comprise potential alternative search terms, said relevancy scores are based in part on click information of a plurality of users and sales information based on purchase information of the plurality of users, the plurality of candidate search terms are at least organized in accordance with brands, and at least one user of said plurality of users does not have a user profile." (Emphasis added). For support, see paragraphs [0020]-[0022], paragraphs [0083]-[0086], and Figures 6 and 8, for example.

In contrast, Kravets discloses providing search results according to a value score determined by bids on particular search terms by website owners. More particularly, search results are ordered by a value score determined by website owners paying to have their website listed in search results for a search term. In this way, the value score is based on "how much revenue is generated by the search term." (Col. 2, lines 36-37). This is described in col. 5, lines 4-19 as follows:

The value score for each search term can be determined in any number of ways. In a preferred embodiment, a value score comprises a number or index that is between 1 and 100 and is calculated as a composite based upon a number of factors. In a

preferred embodiment, where the system 10 is used in conjunction with a pay for performance search engine, the index is a composite in which 85% of the composite is the revenue that that term has generated for the search engine operator and 15% of the composite is the number of time the term has been used in a search in a certain time period. The revenue is preferably calculated by multiplying the bidded amount for a search term and the number of times that search term is entered. The time period for the number of searches preferably comprises one month but can comprise any period of time. The value score can also comprise one or more letters or other symbols.

Therefore, Kravets fails to at least disclose or suggest “said relevancy scores are based in part on click information of a plurality of users and sales information based on purchase information of the plurality of users, the plurality of candidate search terms are at least organized in accordance with brands,” as recited in claim 1.

Independent claims 21 and 31 have been amended similarly to claim 1. Accordingly, claims 1, 21, and 31 are allowable over Kravets.

For at least the foregoing reasons, dependent claims 2, 5-8, 11-15, 19, 20, 22, 25-28, 32, 35-38, 41-45, and 49-59 are allowable over Kravets.

Accordingly, Applicants respectfully request reconsideration and allowance of claims 1-2, 5-8, 11-15, 19, 20-22, 25-28, 31-32, 35-38, 41-45, and 49-59.

Claim Rejections Under 35 USC §103

Claims 9-10, 29-30, and 39-40 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kravets in view of Chaudhuri et al. (U.S. 2003/0078915; hereinafter “Chaudhuri”).

For at least the foregoing reasons, dependent claims 9-10, 29-30, and 39-40 are patentable over Kravets in view of Chaudhuri. Accordingly, Applicants respectfully request reconsideration and allowance of claims 9-10, 29-30, and 39-40.

Claims 16-18, and 46-48 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kravets in view of Conover et al. (U.S. 6,701,314; hereinafter "Conover").

For at least the foregoing reasons, dependent claims 16-18, and 46-48 are patentable over Kravets in view of Conover. Accordingly, Applicants respectfully request reconsideration and allowance of claims 16-18, and 46-48.

CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No.: 03-1952** referencing **Docket No.: 324212003700**. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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